

FCCA, LLC  
2016 W. MOREHEAD ST  
CHARLOTTE, NC 28208

2/2/2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Certification of CPNI Filing  
EB-06-TC-060  
EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Fred R. Lewis".

**CERTIFICATION**

I, Fred Guin, hereby certify this 2nd day of February, 2006 that I am an officer of FCCA, LLC and that I have personal knowledge that FCCA, LLC has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

A handwritten signature in cursive script, appearing to read "Fred C. Guin", is written over a horizontal line.

Fred C. GUIN  
Manager

### STATEMENT

FCCA, LLC ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.